


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 14-163 [Published on 04 November 2014 and officially closed for comments on 02 December 2014]</p>

Commenter 1: PGA - Portugália Airlines – Luís Filipe dos Santos Martins – 10/11/2014

Comment # 1

Concerning Fokker 70/100 PAD 14-163, would like to comment the following:

- Is it possible to extend the period for compliance to two years? This would allow operators to schedule this AD performance on the next heavy maintenance (e.g. C Check).
- Are there any acceptable means of compliance? For example, any MPD task cards that were performed may replace this inspection.

EASA response:

The above comment does not include any statement that EASA need to agree or disagree with, but rather is a set of two questions, for which answers are provided below:

- *The reason for the crack initiation has not been clearly identified so far and might have nothing to do with fatigue. Therefore, EASA elected to apply a straightforward compliance time of one year calendar time, whatever the accumulated flight cycles of the aircraft. Changing the compliance time to next C-check would link the compliance time to Flight Cycles which is not necessarily relevant and would possibly extend the time before inspection up to 3 years, which is not found acceptable with regards to the associated risk.*
- *EASA is not aware of any MPD that would be equivalent to the inspection SB and constitute an AMOC to this AD.*

As a consequence, no changes have been made to the final AD in response to this comment.